

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Jackie Miles** : **Docket: 17 - 15520 – mdc**  
: **Chapter 13**

**Amended Motion To Modify Post – Confirmation**

Debtor, Jackie Miles, hereby moves this Court for an Order granting Debtor leave to modify its confirmed Chapter 13 plan. In support of its motion, Debtor avers as follows:

1. On 8/14/2017, Debtor commenced the above-captioned Chapter 13 bankruptcy.
2. On 11/14/2019, the above-captioned Chapter 13 was confirmed.
3. Prior to confirmation, Debtor requested the his brother, Shawn Miles pay the mortgage on the property.
4. After the Covid – 19 pandemic commenced in March 2020, Debtor’s brother was laid off from his employment.
5. As a result of the lack of employment, unbeknownst to Debtor, his brother stopped paying the mortgage.
6. As a result, the post – petition mortgage arrears caused American Heritage Credit Union filed a Motion for Relief from the Automatic Stay.
7. On 7/1/2020, Creditor, American Heritage Credit Union filed a Motion for Relief from the Automatic Stay as a result of Debtor’s post – petition arrears.
8. Thereafter, on 9/2/2020 the Court approved a stipulation between the parties wherein Debtor would cure post-petition arrears as a part of an amended Chapter 13 plan.
9. Debtor seeks relief pursuant to the Cares Act to extend the Chapter 13 Plan.

WHEREFORE, Debtor respectfully requests that this Court grant Debtor leave to modify its Chapter 13 plan post – confirmation.

Respectfully Submitted:

Date February 3, 2021

/s/ Demetrius J. Parrish, Jr.

Demetrius J. Parrish, Jr., Esquire

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